

André J. Lachance
Attorney



GTE Service Corporation
1850 M Street N.W., Suite 1200
Washington, DC 20036
202 463-5276
Fax: 202 463-5281

VIA HAND DELIVERY

July 7, 1999

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, 445 Twelfth Street, S.W.
Washington, D.C. 20554

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JUL 7 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Implementation of the Subscriber Carrier Selection Changes
Provisions of the Telecommunications Act of 1996, Policies and
Rules Concerning Unauthorized Changes of Consumers' Long
Distance Carriers, CC Docket No. 94-129

Dear Ms. Salas:

In lieu of reply comments in the above-captioned proceeding, GTE Service Corporation and its telephone and wireless companies ("GTE") submit this letter to address an allegation made by MCI WorldCom, Inc. concerning GTE.

In its Comments on Petitions For Reconsideration, filed June 23, 1999, MCI WorldCom stated,

Since the Commission's Order became effective, MCI WorldCom has experienced difficulties making authorized carrier changes where PC freezes were involved in the Bell Atlantic, Pacific Bell and GTE areas . . . MCI WorldCom's experience is that Bell Atlantic will only sometimes accept the three-way call, will only sometimes lift the PC freeze during the three-way call, and will never switch the PIC during the three-way call. Pacific Bell and GTE refuse to even accept the three-way call.¹

MCI WorldCom's statement with respect to GTE is completely false. Prior to the April 27, 1999 effective date of the slamming rules, GTE established procedures for handling three-way calls to remove a PC freeze in accordance with the Commission's rules. This procedure was communicated to GTE's contact center staff. In addition, GTE notified carriers, including MCI WorldCom, of GTE's three-way calling procedures and of GTE's contact center phone

¹ MCI WorldCom Comments at 12-13.

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numbers. It is GTE's belief that the three-way calling procedures are working smoothly.

Nonetheless, immediately after GTE's processes went into effect, GTE received some complaints from MCI alleging that GTE's representatives would not accept three-way calls as a way to change the PIC on a frozen account.² In response to these complaints, GTE spoke with its contact centers staff support groups to ensure that GTE's procedures would be followed. GTE also asked MCI WorldCom to supply GTE with information about any GTE representative that failed to follow GTE's three-way calling procedures. GTE believes these actions resolved any initial problems that may have existed.

GTE believes it has made a good faith effort to implement the three-way calling rules for PC changes. GTE will continue to work with MCI WorldCom and all other carriers to ensure that GTE's procedures for handling three-way calls are implemented properly. As such, while some initial problems may have existed, MCI WorldCom's statement (made in present tense) that "GTE refuse[s] to even accept the three way call" is patently false. The Commission should not consider this statement in considering the petitions for reconsideration.

Sincerely,



Andre J. Lachance

cc: Attached service list

² GTE notes that MCI WorldCom has not presented any verified factual information regarding its experience with GTE. Absent such information, GTE cannot determine whether the initial complaints were a result of GTE representatives failing to properly implement GTE's procedures or MCI WorldCom failing to follow the procedures GTE communicated to carriers.

Robert J. Aamoth
Kelly, Drye & Warren
1200 19th Street, NW
Suite 500
Washington, DC 20036

John B. Adams
Citizens Utilities Company
1400 16th Street, NW
Suite 500
Washington, DC 20036

Danny E. Adams
Kelley Drye & Warren
1200 19th Street, NW
Washington, DC 20036

Edward W. Addison
Virginia State Corporation
P.O. Box 1197
Richmond, VA 23209

Nancy Adler
Technologies Management, Inc.
P.O. Box 200
Winter Park, FL 32790

Michael F. Altschul
Cellular Telecommunications Industry
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Peter Arth, Jr.
Utilities Commission of the State of California
505 Van Ness Avenue
San Francisco, CA 94102

Susan J. Bahr
Law Offices of Susan Bahr
PO Box 86089
Montgomery Village, MD 20886

William J. Balcerski
NYNEX Telephone Companies
1095 Avenue of the Americas
New York, NY 10036

Wendy Bluemling
Southern New England Telephone
227 Church Street
New Haven, CT 06510

Peter M. Bluhm
Vermont Public Service Board
112 State Street, Drawer 20
Montpelier, VT 05602

Richard Blumenthal
State of Connecticut
55 Elm Street
P.O. Box 120
Hartford, CT 06101

Douglas F. Brent
LDDS WorldCom
9300 Shelbyville Road
Suite 700
Louisville, KY 40222

Jonathan E. Canis
Reed Smith Shaw & McClay
1301 K Street, NW
Suite 1100 East Tower
Washington, DC 20005

David Cosson
National Telephone Cooperative
2626 Pennsylvania Avenue, NW
Washington, DC 20037

William J. Cowan
New York State
Three Empire State Plaza
Albany, NY 12223

James E. Doyle
State of Wisconsin
114 East State Capitol
Madison, WI 53707

Susan M. Eid
MediaOne Group, Inc.
1919 Pennsylvania Avenue, NW
Suite 610
Washington, DC 20006

Donald E. Elardo
MCI WorldCom
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Michael B. Fingerhut
Sprint Corporation
1850 M Street, NW
Suite 1100
Washington, DC 20036

Richard M. Firestone
Arnold & Porter
555 Twelfth Street, NW
Washington, DC 20004

Kevin C. Gallagher
360 Communications Company
8725 West Higgins Road
Suite 350
Chicago, IL 60631

Loretta J. Garcia
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Michael R. Gardner
Law Offices of Michael R. Gardner, P.C.
1150 Connecticut Avenue, NW
Suite 710
Washington, DC 20036

David J. Gilles
State of Wisconsin
123 West Washington Avenue
Madison, WI 53707

Michael E. Glover
Bell Atlantic Telephone Companies
1320 North Courthouse Road
Eighth Floor
Arlington, VA 22201

Steven P. Goldman
Teltrust, Inc.
6322 South 3000 East
Salt Lake City, UT 94121

Timothy R. Graham
WinStar Communications, Inc.
1146 19th Street, NW
Washington, DC 20036

Betsy Stover Granger
Pacific Bell & Nevada Bell
4420 Rosewood Drive
4th Floor, Building 2
Pleasanton, CA 94588

Marcy; Greene
Swidler, Berlin Shereff, Firedman
3000 K Street, NW
Suite 300
Washington, DC 20007

David A. Gross
AirTouch Communications, Inc.
1818 N Street, NW
Suite 800
Washington, DC 20036

Catherine M. Hannan
Hunter & Mow
1620 I Street, NW
Suite 701
Washington, DC 20006

Charles H. Helein
Helein & Associates, PC
8180 Greensboro Drive
Suite 700
McLean, VA 22102

Steven D. Hitchcock
Technology Law Group
5335 Wisconsin Avenue, W
Suite 440
Washington, DC 20015

Gregory F. Intoccia
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, DC 22201

Peter H. Jacoby
AT&T Corporation
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Ernest G. Johnson
Public Utility Commission
PO Box 25000-2000
Oklahoma City, OK 73152

Linda Kent
United States Telephone Association
1401 H Street, NW
Suite 600
Washington, DC 20005

Leon M. Kestenbaum
Sprint Communications Company
1850 M Street, NW
Suite 1100
Washington, DC 20036

Douglas W. Kinkoph
LCI International, Inc.
4250 North Fairfax Drive
Arlington, VA 22203

Kathryn Marie Krause
U S West Communications, Inc.
1020 19th Street, NW
Suite 700
Washington, DC 20036

Jane Kunka
Qwest Communications Corporation
4250 North Fairfax Drive
Arlington, VA 22203

Andrew D. Lipman
Swidler & Berlin Chartered
3000 K Street, NW
Suite 300
Washington, DC 20007

Randall B. Lowe
Piper & Marbury
1200 19th Street, NW
Washington, DC 20036

Robert Lynch
Southwestern Bell Corporation
One Bell Plaza
Room 2403
Dallas, TX 75202

Gary L. Mann
Texas Statewide Telephone Cooperative, Inc.
3721 Executive Center Drive
Suite 200
Austin, TX 78731

Suzi Ray McClellan
Office of Public Utility Counsel
1701 N. Congress Avenue
Austin, TX 79711

William Terry Miller
TELCAM
901 Rosenberg
Galveston, TX 77550

Genevieve Morelli
Competitive Telecommunications Association
1900 M Street, NW
Suite 800
Washington, DC 20036

Brad E. Mutschelknaus
Kelley Drye & Waren
1200 19th Street, NW
Suite 500
Washington, DC 20036

James G. Pachulski
Bell Atlantic Telephone Companies
1320 North Courthouse Road
Eighth Floor
Arlington, VA 22201

Larry A. Peck
Ameritech Operating Companies
2000 West Ameritech Center Drive
Room 4H86
Hoffman Estates, IL 601961025

Gary L. Phillips
Ameritech
1401 H Street, NW
Suite 1020
Washington, DC 20005

Barry Pineles
GST Telecom, Inc.
4001 Main Street
Vancouver, WA 98663

David R. Poe
LeBoeuf, Lamb, Greene & MacRae
1875 Connecticut Avenue, NW
Washington, DC 200095728

Ernest D. Preate, Jr.
Commonwealth of Pennsylvania
Strawberry Square
Fourteenth Floor
Harrisburg, PA 17120

Bryan Rachlin
Telco Communications Group, Inc.
4219 Lafayette Center Drive
Chantilly, VA 20151

Rebecca L. Reed
Hertz Technologies, Inc.
5601 Northwest Expressway
Oklahoma City, OK 73131

Evelyn R. Robinson
Ohio Consumers' Counsel
77 South High Street
15th Floor
Columbus, OH 43221

Paul Rodgers
National Association of Regulatory
1201 Constitution Avenue, Suite 1102
P.O. Box 684
Washington, DC 20044

Mark C. Rosenblum
AT&T Corporation
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Elisabeth H. Ross
Birch, Horton, Bittner & Cherot
1155 Connecticut Avenue, NW
Suite 1200
Washington, DC 20036

Rachel J. Rothstein
Cable & Wireless
8219 Leesburg Pike
Vienna, VA 22182

Richard M. Sbaratta
BellSouth Corporation
1155 Peachtree Street
Suite 1700
Atlanta, GA 303093610

John T. Scott, III
Crowell & Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy L. Shobert
General Communciation, Inc.
901 15th Street, NW
Suite 900
Washington, DC 20005

Michael J. Shortley, III
Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

James W. Spurlock
AT&T
1120 20th Street, NW
Suite 1000
Washington, DC 20036

Gary A. Tomlin
Alabama Public Service Commission
P.O. Box 991
Montgomery, AL 361010991

James P. Tuthill
Pacific Telesis Group
140 New Montgomery Street
Room 1523
San Francisco, CA 94105

Ian D. Volner
Veneable, Baetjer, Howard & Civiletti
1201 New York Avenue, NW
Suite 1000
Washington, DC 20005

Richard S. Whitt
MCI Worldcom, Inc.
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Antoinette R. Wike
North Carolina Public Utilities Commission
430 North Salisbury Street
P.O. Box 29520
Raleigh, NC 27626

Christopher J. Wilson
Frost & Jacobs
2500 Central Trust Center
201 East Fifth Street
Cincinnati, OH 45202